



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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REPLY TO THE ATTENTION OF:

SRF-5J

JUN 16 1999

Mr. Johnny Reising  
United States Department of Energy  
Feed Materials Production Center  
P.O. Box 398705  
Cincinnati, Ohio 45239-8705

RE: OSDF Leachate Conveyance System

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) systems plan for the interim Leachate Conveyance System (LCS) for the On-Site Disposal Facility (OSDF), and the May 28, 1999 letter including four enclosures regarding the interim LCS.

U.S. EPA finds that the systems plan adequately describes the operation and maintenance of the interim leachate collection system. However, on Page 3-16 of the systems plan, the text states that "should any of the above inspections reveal systems deficiencies, the conditions shall be corrected utilizing a procedure." This sentence should be revised to also state that any corrective measure procedures that are developed will be sent to the regulatory agencies for review and approval.

The May 28, 1999, letter describes the recently completed construction and testing of the slipline and temporary above-grade pipeline installed to address leaks identified in the OSDF LCS. On June 3, 1999, a conference call was held between U.S. EPA, Ohio Environmental Protection Agency, and U.S. DOE to resolve issues on the LCS. Subsequently, U.S. DOE's contractor submitted via facsimile, on June 3, 1999, a letter from the sliplining contractor, CSR Pipeline Systems, and a procedure for operating the LCS.

The letter, enclosures, and additional material sent on June 3, 1999, demonstrate that the LCS is adequate and can handle leachate generated from the OSDF cells. Two main issues affecting the long-term performance of the LCS are summarized below:

1. The sliplined portion of the LCS was tested at 15 pounds per square inch (psi) instead of the 50 psi specified in the design criteria package (DCP). Although the letter states that the 15-psi pressure exceeds 1.5 times the maximum operating pressures at manholes 1, 2, and 3, the variance from DCP is of concern.
2. The leak in the LCS from OSDF cell No. 1 to cell No. 2 must be evaluated and repaired at the earliest possible opportunity.

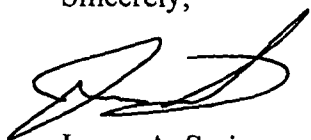
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As a result, U.S. EPA approves the placement of materials in Cell 2 of the OSDF, but prohibits placement of waste materials in Cell 1 until the LCS leak between manholes 1 and 2 is repaired and such documentation of the repair is approved by U.S. EPA.

Finally, it is U.S. EPA's position that the sliplining technology used in the LCS and the interim, above-grade LCS are adequate in the short-term to handle leachate generated from the OSDF. However, this system is inadequate as a permanent design for the life of the OSDF. U.S. DOE must pursue actions to replace the LCS from Cell 1 and 2 of the OSDF to the lift station with a rebuilt system designed for the life of the OSDF. Discussions for such replacement should begin immediately between the Agencies to plan when LCS replacement will least impact site activities.

Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,



James A. Saric  
Remedial Project Manager  
Federal Facilities Section  
SFD Remedial Response Branch #2

cc: Tom Schneider, OEPA-SWDO  
Bill Murphie, U.S. DOE-HQ  
John Bradburne, FERMCO  
Terry Hagen, FERMCO  
Tom Walsh, FERMCO

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